



**Maryland Department of Environment**  
**Water Management Administration**  
**Compliance Program - Eastern Division**  
**407 Race St, Cambridge, MD 21613**  
**410-901-4020**

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**Field Inspection Report by:** Michele Burroughs

**Media Type(s):** NPDES Industrial Minor Surface Water

**Inspection Date:** February 24, 2011

**Site Name:** Assateague Island-National Seashore HQ WWTP

**Facility Address:** 7206 National Seashore Lane, Berlin, MD 21811

**County:** Worcester County

**NPDES Industrial Minor Surface Water**

**Permit / Approval Numbers:** DP-2530/MD0021091

**Site Status:** Active

**Site Condition:** Noncompliance

**Contact(s):**  
Steve Main - Superintendent

**Recommended Action:** Refer to Others (See Findings)

**Inspection Reason:** Routine Scheduled, Initial Quarterly

**Evidence Collected:**

Visual Observation

**Inspection Findings:**

A. Permit Verification

The facility holds State Discharge Permit 05-DP-2530, NPDES Permit MD0021091, which became effective July 1, 2006 and expires June 30, 2011. Per Mahendra Chawla, the Department is in receipt of the permit renewal application.

B. Records

December 2010 - The DMR shows noncompliance. The laboratory data sheets and chains of custody were available and complete. The total nitrogen monthly average loading was reported as 0.1 lbs/day, the weekly average loading as 0.101 lbs/day, the monthly average concentration as 3.8 mg/l and the weekly average concentration as 5.5 mg/l with 4 excursions. The total phosphorus monthly average loading was reported as 0.01 lbs/day, the weekly average loading as 0.010 lbs/day, the monthly average concentration as 0.5 mg/l and the weekly average concentration as 0.93 mg/l with 3 excursions. The average daily flow was reported as 0.001 MGD.

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November 2010 - The DMR shows noncompliance. The laboratory data sheets and chains of custody were available and complete. The total nitrogen monthly average loading was reported as 0.1 lbs/day, the weekly average loading as 0.219 lbs/day, the monthly average concentration as 6.9 mg/l and the weekly average concentration as 15.0 mg/l with 4 excursions. The total phosphorus monthly average loading was reported as 0.07 lbs/day, the weekly average loading as 0.249 lbs/day, the monthly average concentration as 6.4 mg/l and the weekly average concentration as 16.96 mg/l with 7 excursions. The average daily flow was reported as 0.002 MGD. The 11/10/2010 ammonia result of 0.12 mg/l was transcribed onto the MOR as 1.05 mg/l, and was therefore used in the DMR calculations.

October 2010 - The DMR shows noncompliance. The laboratory data sheets and chains of custody were available and complete. The total nitrogen monthly average loading was reported as 0.5 lbs/day, the weekly average loading as 0.863 lbs/day, the monthly average concentration as 32 mg/l and the weekly average concentration as 40.5 mg/l. The total phosphorus monthly average loading was reported as 0.18 lbs/day, the weekly average loading as 0.339 lbs/day, the monthly average concentration as 10.0 mg/l and the weekly average concentration as 11.02 mg/l with 9 excursions. The average daily flow was reported as 0.002 MGD.

#### C. Maintenance and Operations

The system consists of a bar screen, followed by vibratory separator, an equalization tank, anoxic tank, an aerobic tank, a second anoxic tank and a reaeration tank. The effluent from the reaeration tanks is filtered through two parallel basket filters prior to treatment by 4 Berghof ultrafilters. The permeate from the ultrafilters is disinfected with 2 UV units, followed by a 2000 gallon vertical tank.

Mr. Main stated that the vibratory separator has operated well since installation and appears to be permanent. Mr. Main stated that the National Park Service had entered into a 180-day contract with SOS, Inc. to assist with the plant operations. Recommended changes which have been implemented include replacement of the air mixers in the anoxic tanks with 2 Gould's pumps with a 45 degree angle, and the addition of half a bag of soda ash to the equalization tank. The dissolved oxygen concentration in the first anoxic tank was 0.02 mg/l and 0.01 mg/l in the second anoxic tank. Mr. Main stated that they are adding sodium hydroxide, poly aluminum chloride, and Micor cg as a carbon source. Mr. Main stated that the facility was using \$500-\$600/week on Micro cg, and were looking for a more cost effective carbon source. Mr. Main was told that The Landings uses sugar water in their process as a carbon source. Mr. Main stated that the facility has started wasting out solids at a rate of 180 gallons/day to Snow Hill. A new concrete tank has been added outside the building for the storage of the wasted product.

The facility has a new operator, Mr. John Adams. Mr. Adams holds a temporary WW-3, WT-3 operator's license number 3089, which became effective 2/1/2014.

#### D. Effluent Receiving Water

The facility was not discharging at the time of the inspection.

#### E. Sampling

The facility was not discharging at the time of inspection and therefore samples were not collected during the inspection.

#### F. Stormwater Pollution Prevention Plan

This facility is not required to develop nor implement a stormwater pollution prevention plan.

#### G. Corrective Actions

1. The permittee is advised that the facility should operate the facility in compliance with permit requirements, including but not limited to compliance with discharge permit limits.

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### NPDES Industrial Minor Surface Water - Inspection Checklist

| <b><i>Inspection Item</i></b>   | <b><i>Status</i></b>      | <b><i>Comments</i></b> |
|---|---------------------------|------------------------|
| 1. Does the facility have a discharge permit? [Environment Article §9-323a(1-3)]  | No Violations<br>Observed |                        |
| 2. Is the discharge permit current? Has facility applied for renewal? [Environment Article §9-328a(1)]  | No Violations<br>Observed |                        |
| 3. Is the facility as described in the current permit? Are treatment processes as described in the current permit? [COMAR 26.08.04.01.01B(4)]   | No Violations<br>Observed |                        |
| 4. Has notification been submitted about any new, different or increased discharges? [40 CFR Part 122 Subpart C Section 122.42.b(1-3)]  | No Violations<br>Observed |                        |
| 5. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-3314]   | No Violations<br>Observed |                        |
| 6. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.j(3)]   | No Violations<br>Observed |                        |
| 7. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1.02-1A(3)]   | No Violations<br>Observed |                        |
| 8. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)]   | No Violations<br>Observed |                        |
| 9. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03.03B(3)(a, b, c, e)]    | No Violations<br>Observed |                        |
| 10. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03.03B(3)(d)]   | No Violations<br>Observed |                        |
| 11. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03.03B(1)] | No Violations<br>Observed |                        |
| 12. Is the lab and monitoring equipment being properly calibrated and maintained? Are they keeping records to reflect this? [Environment Article §9-3313]   | No Violations<br>Observed |                        |
| 13. Is laboratory controls and appropriate quality assurance procedures properly operated and maintained? [40 CFR Part 122 Subpart C Section 122.41.e]  | No Violations<br>Observed |                        |

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| 14. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03.03C(1)]   | No Violations<br>Observed |                        |
| 15. Has the permittee submitted these results within the allotted time? [COMAR 26.08.04.03.03C(2)]  | No Violations<br>Observed |                        |
| 16. Are discharge monitoring reports complete and reflect permit conditions? [COMAR 26.08.04.03B(3)]  | No Violations<br>Observed |                        |
| 17. Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e] | No Violations<br>Observed |                        |
| 18. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.03.03]  | No Violations<br>Observed |                        |
| 19. Any by-pass since last inspection? Has permittee submitted notice of any by-pass? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)]   | No Violations<br>Observed |                        |
| 20. Any non-complying discharges experienced since last inspection? Has regulatory agency been notified? [40 CFR Part 122 Subpart C Section 122.41.l(6)]  | Out of<br>Compliance      | See findings.          |
| 21. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A]   | No Violations<br>Observed |                        |
| 22. Has records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B]  | No Violations<br>Observed |                        |
| 23. Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e]   | No Violations<br>Observed |                        |
| 24. Are discharge monitoring points adequate for representative sampling? Do parameters and sampling frequency meet the minimum requirements? Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)]                            | No Violations<br>Observed |                        |
| 25. Are analytical testing procedures approved by EPA? If alternate analytical procedures are used, proper approval has been obtained? [COMAR 26.08.01.02B(1)]  | No Violations<br>Observed |                        |
| 26. Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03.03A(3)]  | No Violations<br>Observed |                        |

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| 27. Were discharges observed at the authorized outfalls? Does the facility have any unauthorized discharges to waters of the State? [Environment Article §9-322]  | Not Evaluated          |                        |
| 28. Does the discharges or receiving waters have any visible pollutants (oil sheen, grease, turbidity, foam, floating solids, color), odor, noncompliant DO concentrations, and/or noncompliant temperature ranges? [Environment Article §9-314b(1)]  | No Violations Observed |                        |
| 29. Were discharge samples collected? [Environment Article §9-261c(1)]  | Not Evaluated          |                        |
| 30. Is the facility required to have a storm water pollution prevention plan? Has storm water pollution prevention plan been developed and implemented as required? Does storm water pollution prevention plan require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart B Section 122.26.c(1)(I)(A-B)] | Not Applicable         |                        |
| 31. Are the permit conditions being met? [Environment Article §9-326a(1)]   | Out of Compliance      | See findings.          |

Inspector: \_\_\_\_\_  
 Michele Burroughs

Received by: \_\_\_\_\_